

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: TIMOTHY WOOD
KIMBERLY WOOD

CASE NO.: 19-14516-JDW
CHAPTER 13

RESPONSE TO MOTION TO SELL REAL ESTATE

COMES NOW, Wells Fargo Bank, N.A., by and through its attorney, and files this response to the Debtor's Motion to Sell Real Estate [doc. 43], and respectfully submits the following:

1. Wells Fargo Bank, N.A. is a secured creditor in the above entitled case by virtue of its holding a Note secured by a Deed of Trust affecting property of the Debtor located at 560 RIDGE VIEW S, HERNANDO, MS 38632-7589. The Note and Deed of Trust is payable in monthly installments and the property affected by the mortgage is the home of the Debtor.
2. Creditor has no objection to the property at issue being sold, however, Wells Fargo Bank, N.A. requests that the ongoing monthly mortgage payments are maintained.
3. Creditor requests that the sales price not be less than the full amount owed by the Debtor, and that its lien be paid in full out of the proceeds of the sale.
4. If the sales price is less than the full amount owed by the Debtors to pay the lien, then Creditor requests and requires prior approval and review of any short sale and reserves the right to deny any short sale requests. Further, Creditor requests that there be no requirement to withdraw the claim in the event the sale does not happen.
5. For other good and valid reasons to be shown at the hearing of the Motion to Sell Real Estate.

Respectfully submitted, this the 7th day of March, 2022.

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/s/ Kimberly D. Putnam
Kimberly D. Putnam (Bar #102418)
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CERTIFICATE OF SERVICE

I, Kimberly D. Putnam, hereby certify that I have notified all interested parties of the Response to the Motion to Sell Real Estate filed by Wells Fargo Bank, N.A., who are listed as follows:

Timothy Wood
Kimberly Wood
560 RIDGE VIEW S
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by electronic transmission or by mailing this notice and a copy of the Response to the Motion to Sell Real Estate filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this the 7th day of March 2022.

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